

STATE OF MICHIGAN

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DEPARTMENT OF HEALTH AND HUMAN SERVICES LANSING

ELIZABETH HERTEL

IV-D MEMORANDUM 2021-017

TO:	All Friend of the Court (FOC) Staff All Prosecuting Attorney (PA) Staff All Office of Child Support (OCS) Staff	UPDATE(S):
FROM:	Erin P. Frisch, Director Office of Child Support	✓ Manual✓ Form(s)
DATE:	July 14, 2021	

SUBJECT: Updates to Section 3.15, "Addresses," of the *Michigan IV-D Child Support*

Manual and Updates to the National Change of Address (NCOA) Process

for Locate Purposes

ACTION DUE: None

POLICY EFFECTIVE DATE: Upon receipt

PURPOSE:

This IV-D Memorandum announces the following updates to Section 3.15, "Addresses":

- Addition of the Billing Coupon (DHS-1259) as a means for non-custodial parents (NCPs) to submit a change in their mailing or residential address in the Michigan Child Support Enforcement System (MiCSES);
- Revisions related to the National Change of Address (NCOA) submittal process, including clarification on how the process partially satisfies federal locate requirements; and
- Clarification that IV-D workers with the ability to validate and update mailing and residential addresses over the telephone include Michigan State Disbursement Unit (MiSDU) staff members.

Significant changes to Section 3.15 since its last publication are indicated by a change bar in the right margin. Section 3.15 also incorporates content from several frequently asked questions (FAQs) regarding addresses. This content is not indicated by a change bar unless it contains significant updates since its last publication.

DISCUSSION:

A. Use of the Billing Coupon to Report Address Changes

In November 2020, OCS updated the *Billing Coupon* to include a "Change of Address" checkbox that allows NCPs the ability to indicate they have a change in their mailing address.¹ As with other "change of address" forms, MiSDU staff will not process mailing address changes if the NCP has not signed and dated the *Billing Coupon*.

NCPs cannot use the *Billing Coupon* to change their legal address. The back of the coupon provides guidance to NCPs on how change their legal address with the court.²

OCS has added the *Billing Coupon* to Section 3.15 as another method for NCPs to change their mailing and/or residential address in MiCSES. Policy has also been updated to allow MiSDU staff members the ability to update address information once verification requirements have been met.

B. NCOA and Locate

OCS last updated Section 3.15 on January 17, 2020 as a result of corrections to the NCOA MiCSES batch process.³ As part of this update, OCS removed Subsection 3.2.5, "90-Day Locate Attempt Requirement" from Section 3.15 because the requirement is explained in Section 3.05, "Locate," of the *Michigan IV-D Child Support Manual*. However, the removal of this subsection unintentionally created confusion as to how the NCOA^{Link} service should be used as a locate resource and what impact that has on the federal locate requirements.

Following the last publication of Section 3.15, OCS determined further clarification regarding the relationship between the NCOA and locate requirements was needed. As a result, OCS has added Subsection 3.2.5, "NCOA and Locate," to Section 3.15 to discuss the locate requirements and explain why responses from the NCOA alone do not satisfy federal locate attempt requirements.

Specifically, Subsection 3.2.5 clarifies the following:

- NCOA does not satisfy the federal locate attempt requirement;
- NCOA is verification even if it doesn't meet the federal locate attempt requirement; and

¹ This was announced in <u>IV-D Memorandum 2020-031</u>, <u>Michigan State Disbursement Unit (MiSDU)</u> Vendor Transition Information, Including Revised Forms and Publications.

² Ref: <u>Section 3.15, "Addresses," of the *Michigan IV-D Child Support Manual* for information on legal address changes.</u>

³ Ref: IV-D Memorandum 2020-001, Corrections to the National Change of Address (NCOA) Process.

 The discrepancy between Contract Performance Standards permission and federal requirements.

Note: The federal Office of Child Support Enforcement (OCSE) notified OCS that due to an unexpected complication with OCSE's NCOA contract, NCOA files submitted after May 21, 2021 were not processed. Additionally, OCSE advised that files will continue to not be processed until contract issues are resolved.⁴ OCSE has indicated that contract resolution may take several months.

C. Other Updates to Section 3.15

Section 3.15 includes the following additions and clarifications to policy regarding addresses. Some of this content has been incorporated from FAQs.

1. "Change of Address" Forms

The Address Change Request (DHS-1376), Debit Card Authorization (DHS-1371) and the Direct Deposit Authorization (DHS-1377) were already mentioned in Section 3.15 as methods for case members to change their mailing or residential address. However, OCS added these forms in other areas of the manual section for clarity.

2. Electronic Sources for Verifying Addresses

Section 3.15 lists electronic sources that can be used to verify addresses. This list is not meant to be exhaustive. IV-D staff may use other electronic verification sources available to them, as necessary. Section 3.15 also explains the verification of addresses from electronic sources using the "verified" date. For **new** residential and mailing addresses to be considered verified, they cannot be more than 60 days old.

3. Additional Updates

- a. Added "mailing address" to "residential address" as a type of address that MiSDU staff can change;
- b. Clarified that support specialists and MiSDU staff must generate the Change in Personal Information (FEN350) form when a custodial party's (CP's) or NCP's mailing or residential address is changed in MiCSES and there is an existing legal mailing address;
- c. Emphasized that the MiSDU will change a mailing address upon receipt of a signed form;

⁴ Ref: the June 1, 2021 email notification <u>Issue Identified: National Change of Address (NCOA) Match Files Are Not Being Processed.</u>

- d. Added that when a member has a verified address in MiCSES that is older than 60 days, IV-D staff do not need to re-verify the address unless there is reason to believe that the address is no longer a good address;
- e. Added that an address received from the Department of Corrections may need further investigation by a IV-D worker;
- f. Clarified that MiSDU staff will change a residential and/or mailing address based on information in the NCOA database, from a forwarding address notification, or from a phone call in which the CP or NCP has validated his/her identifying information;
- g. Added direction allowing IV-D staff to change a mailing/residential address over the phone and mark the address as "Y – Confirmed/Verified Good" as long as the IV-D worker is confident in the accuracy of the address provided by the case participant and the NCP is not a survivor of family violence; and
- h. Updated references in footnotes and made minor updates to form titles.

NECESSARY ACTION:

Review Section 3.15 of the *Michigan IV-D Child Support Manual*. For those maintaining a hard copy of the manual, print the manual section and add it to the manual. Discard the previously published version of Section 3.15 (published January 17, 2020).

REVIEW PARTICIPANTS:

Case Management Work Improvement Team Financials Work Improvement Team Program Leadership Group

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ATTACHMENT:

Section 3.15: Addresses

EPF/KRB